

*COUNSEL FOR PLAINTIFFS AND PROPOSED CLASS
LISTED ON NEXT PAGE*

MALCOLM A. HEINICKE (State Bar No. 194174)
TREVOR D. DRYER (State Bar No. 247826)
MUNGER, TOLLES & OLSON LLP
560 Mission Street
Twenty-Seventh Floor
San Francisco, CA 94105-2907
Telephone: (415) 512-4000
Facsimile: (415) 512-4077
E-mail: Malcolm.Heinicke@mto.com

Attorneys for Defendants
WACHOVIA CORP. ET AL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROBERT CRIDER, on behalf of himself
and others similarly situated,

Plaintiff,

vs.

WACHOVIA CORPORATION, a
corporation, WACHOVIA MORTGAGE
CORPORATION, a corporation,
WACHOVIA COMMERCIAL
MORTGAGE, INC., a corporation,
WACHOVIA FINANCIAL SERVICES,
INC., WACHOVIA MORTGAGE, FSB,
and entity form unknown, WACHOVIA, an
entity form unknown, and, DOES 1 through
100 inclusive,

Defendants.

CASE NO. CV 08-04288-EMC

**STIPULATION AND PROPOSED
ORDER RE: CONTINUANCE OF
INITIAL CASE MANAGEMENT
CONFERENCE AND RELATED
DEADLINES**

The Honorable Edward M. Chen

Date: December 17, 2008
Time: 1:30 p.m.
Courtroom: C, 15h Floor

Proposed Date: March 18, 2009

1 PETER M. HART (SBN 198691)
2 LAW OFFICES OF PETER M. HART
3 13952 Bora Bora Way, F-320
4 Marina Del Rey, CA 90292
5 Telephone: (310) 478-5789
6 Facsimile: (509) 561-6441
7 Email: hartpeter@msn.com

8 LARRY W. LEE (SBN 228175)
9 DIVERSITY LAW GROUP
10 444 S. Flower Street, Suite 1370
11 Los Angeles, CA 90071
12 Telephone: (213) 488-6555
13 Facsimile: (213) 488-6554

14 KENNETH H. YOON (SBN 198443)
15 LAW OFFICES OF KENNETH H. YOON
16 One Wilshire Boulevard, Suite 2200
17 Los Angeles, CA 90017
18 Telephone: (213) 612-0988
19 Facsimile: (213) 947-1211
20 kyoonyoon@yoonyoon-law.com

21 Attorneys for Plaintiff ROBERT CRIDER and those
22 similarly situated

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24 //

1 WHEREAS, Plaintiff Robert Crider (“Plaintiff”) brings this putative wage and
2 hour class and collective action against Defendant Wachovia Mortgage, FSB (“Defendant”) and
3 other affiliated entities (Plaintiff and Defendant shall hereinafter be referred to as the “parties”);

4 WHEREAS, the parties exchanged substantial information on the proposed class
5 and then following further discussions, mediated the case in front of David A. Rotman, Esq. on
6 October 7, 2008, and through this mediation, they reached a settlement agreement which the
7 parties will shortly be presenting to the Court for preliminary approval;

8 WHEREAS, the settlement reached by the parties will also address and result in
9 the dismissal of *Sones v. World Mortgage Co. et al.*, No. 08-04811-CRB, which is currently
10 pending before the Honorable Charles Breyer of this Court;

11 WHEREAS, in light of this settlement and the parties’ plan to present this
12 settlement for preliminary approval, they respectfully submit that a continuance of the Initial
13 Case Management Conference and the associated deadlines for ninety (90) days would conserve
14 judicial resources and avoid unnecessary expense to the parties;

15 WHEREAS, the parties respectfully request that the Court re-schedule the case-
16 management conference for a date on or after Wednesday, March 18, 2009 and continue the
17 associated case management deadlines;

18 WHEREAS, the parties have executed a term sheet outlining the terms of the
19 settlement;

20 WHEREAS, the parties plan to file their motion for preliminary approval of the
21 class settlement on or before January 9, 2008;

22 WHEREAS, the parties plan to file consents to proceed before the Honorable
23 Edward M. Chen for all purposes in this matter;

24 IT IS HEREBY STIPULATED by the parties, through their counsel of record,
25 that the Initial Case Management Conference in this matter is continued to March 18, 2009 at
26 1:30 p.m., and the associated dates are continued accordingly such that they shall precede the re-
27 scheduled Case Management Conference.
28

1 DATED: November 26, 2008

DIVERSITY LAW GROUP

2
3 By: /s/ Larry W. Lee
LARRY W. LEE

4 Attorneys for Plaintiff Robert Crider

5 DATED: November 26, 2008

MUNGER, TOLLES & OLSON LLP

6
7 By: /s/ Malcolm A. Heinicke
MALCOLM A. HEINICKE

8 Attorneys for Defendant World
9 Savings, Inc.

10
11 I, Malcolm A. Heinicke, attest that I have obtained concurrence from Larry W. Lee in the filing of
12 this Stipulation And ~~Proposed~~ Order Re: Continuance of Initial Case Management Conference
13 and Related Deadlines. See N.D. Cal. General Order 45 § 10(B).

14
15 **GOOD CAUSE APPEARING AND PURSUANT TO STIPULATION, IT IS SO**
16 **ORDERED:**

17 The Initial Case Management Conference is continued to March 18, 2009 at 1:30 p.m., ~~or~~
18 to _____, 2009, and Joint CMC Statement due March 11, 2009.

19 The deadlines associated with the Initial Case Management Conference will track the
20 continued date.

21 Date: December 10, 2008

